

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION, *as assignee of individuals who are Covered Persons,* JANE DOE-1, *a law enforcement officer,* JANE DOE-2, *a law enforcement officer,* EDWIN MALDONADO, SCOTT MALONEY, JUSTYNA MALONEY, PATRICK COLLIGAN, PETER ANDREYEV, and WILLIAM SULLIVAN,

Plaintiffs,

v.

QUANTARIUM ALLIANCE, LLC, AND QUANTARIUM GROUP, LLC, RICHARD ROES 1-10, *fictitious names of unknown individuals* and ABC COMPANIES 1-10, *fictitious names of unknown entities,*

Defendants.

Case No.: 24-cv-04098

**DECLARATION OF MALCOLM CANNON IN SUPPORT OF
DEFENDANT QUANTARIUM ALLIANCE, LLC, AND QUANTARIUM
GROUP, LLC'S SUPPLEMENTAL MEMORANDUM OF LAW IN
SUPPORT OF THE CONSOLIDATED MOTION TO DISMISS PLAINTIFFS'
COMPLAINTS FOR LACK OF PERSONAL JURISDICTION**

I, Malcolm Cannon, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct:

1. I make this declaration in support of Defendant Quantarium Alliance, LLC, and Quantarium Group, LLC's ("Quantarium") Supplemental Memorandum of Law in Support of the Consolidated Motion to Dismiss Plaintiffs' Complaints for Lack of Personal Jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2).

2. I am the Chief Operating Officer of Defendant Quantarium. I am fully familiar with the facts and circumstances in this matter and have personal knowledge of the facts stated herein.

3. Quantarium operates a data analytics platform that provides users with access to property intelligence, including real estate valuations, parcel-level property details, and market trends derived from publicly available sources. While ownership records may be included as part of the publicly sourced property data, they are non-primary to the platform's core focus on property value, property characteristics, and structure characteristics and valuation rather than individual ownership information.

4. Quantarium is a corporation organized under the laws of Delaware, with its headquarters and principal place of business in Bellevue, Washington.

5. Quantarium is not incorporated in New Jersey, nor is it licensed or registered to do business in New Jersey. It has not appointed a registered agent in New Jersey for service of process.

6. Quantarium does not maintain, and has never maintained, any office or other physical location in New Jersey. It does not own or lease any real property in New Jersey, and it has no mailing address or telephone listing there.

7. Quantarium has no employees, representatives, or agents operating in New Jersey. No officer or employee of Quantarium is based in New Jersey, and the company does not send its personnel to New Jersey to conduct business on its behalf.

8. Quantarium maintains no bank accounts or other financial assets in New Jersey. It pays no taxes to New Jersey, as it has no business operations in that state.

9. Quantarium does not direct any advertising, marketing, or solicitation specifically toward New Jersey or its residents. The company does not target New Jersey as a market for its products or services and does not tailor any aspect of its business to New Jersey consumers.

10. As it relates to the claims in this matter, none of the email boxes to which the purported takedown requests were sent are maintained or managed in New Jersey, and so no putative (though unpledged) negligence could have occurred in New Jersey.

11. As detailed above, Quantarium has no physical presence in New Jersey or significant contacts with that state. The facts provided in this declaration show that Quantarium has not engaged in any activities in New Jersey related to Plaintiffs' claims.

I declare under penalty of perjury on this 19 day of March 2025, that the foregoing is true and correct to the best of my knowledge and belief.

DocuSigned by:

Malcolm Cannon
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Malcolm Cannon

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2025 I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

Date: March 19, 2025

/s/ *Clair E. Wischusen*

Clair E. Wischusen